

Bruce Berline, Esq.
Law Office of Bruce Berline

Macaranas Building, Second Floor
P.O. Box 5682 CHRB
Garapan, Saipan, MP 96950
Telephone: (670) 233-3663
Facsimile: (670) 233-5262

Attorney for Lawrence Kalen

UNITED STATES DISTRICT COURT

FOR

THE NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KALEN, GREGGORY SABLAN, KALEN,
LAWRENCE, and SABLAN, MANUEL
ALDAN,

Defendants.

CRIMINAL CASE NO. 08-00014

DEFENDANT LAWRENCE KALEN'S
MOTION FOR REVIEW AND
REVOCATION OF DETENTION ORDER

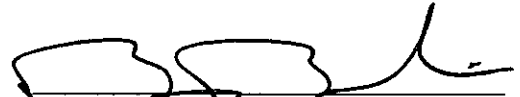
Time: 9:00 a.m.
Date: May 29, 2008
Judge: Munson

Lawrence Kalen, defendant in the above-entitled action, by and through his counsel , Bruce Berline, hereby moves the court, pursuant 18 U.S.C. § 3145 (b), to review and revoke Defendant's detention order and set any needed conditions for his release pending trial.

This motion is made on the grounds the Government has failed to prove that Defendant Lawrence Kalen is not entitled to be released pending trial and thus Defendant's continued detention is in violation of the Bail Reform Act of 1984, 18 U.S.C. § 3141, *et seq.*, and Defendant's rights under the Fifth and Eighth Amendments of the United States Constitution prohibiting the deprivation of liberty without due process and excessive bail, respectively.

1 This motion is based on all the files and records of this case, and on the accompanying
2 memorandum of points and authorities filed contemporaneously with this motion

3
4 Dated this 23rd day of May, 2008.



BRUCE BERLINE
Attorney for Defendant
P.O. Box 5682 CHRB
Saipan, MP 96950